

*(Stipulating Parties Appear on Signature Page)*

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

IN RE: CATHODE RAY TUBE (CRT)  
ANTITRUST LITIGATION

Master File No. 07-CV-5944-JST

MDL No. 1917

### This Document Relates to:

**STIPULATION AND ~~PROPOSED~~ ORDER  
SUBSTITUTING NAMED PLAINTIFF FOR  
NEW MEXICO**

## *ALL INDIRECT PURCHASER ACTIONS*

Judge: Honorable Jon S. Tigar  
Courtroom: Courtroom 6 – 2nd Floor

1 IT IS HEREBY STIPULATED, pursuant to the Federal Rules of Civil Procedure, Rule 15  
2 (a)(2) and Civil L.R. 7-1(a)(5) and 7-12, by and between the undersigned parties hereto, through their  
3 respective attorneys of record, that Indirect Purchaser Plaintiffs (“IPPs”) may amend the Fifth  
4 Consolidated Amended Complaint, ECF No. 5589 (the “Fifth CAC”) to substitute Marylou Hillberg,  
5 in her capacity as the Personal Representative for the Estate of William Craig Stephenson, for Mary  
6 Ann Stephenson as the named plaintiff for the State of New Mexico.

7 IT IS FURTHER STIPULATED that the name “Mary Ann Stephenson” on page 1 and in  
8 Paragraph 270 of the Fifth CAC is hereby removed and substituted with the name: “Marylou Hillberg  
9 as the Personal Representative for the Estate of William Craig Stephenson.”

10 IT IS FURTHER STIPULATED that Paragraph 38 of the Fifth CAC is hereby amended to  
11 read as follows:

12 Plaintiff Marylou Hillberg is the Personal Representative of the Estate of William  
13 Craig Stephenson. During the relevant period, William Craig Stephenson was a  
14 resident of New Mexico and indirectly purchased CRT Products from one or more of  
15 the Defendants or their co-conspirators and was injured by reason of the antitrust  
16 violations alleged in this Complaint.

17 IT IS FURTHER STIPULATED that the undersigned defendants, Irico Group Corporation  
18 and Irico Display Devices Co., Ltd. (together “Irico”), shall not be required to amend their answers  
19 to the Fifth CAC, and that all denials, responses and affirmative defenses contained in their answers  
20 to the Fifth CAC shall still be responsive.

21 IT IS FURTHER STIPULATED that Irico shall not be deemed to have waived any defenses  
22 by entering into this stipulation, and reserves all rights to challenge Ms. Hillberg’s status as an  
23 adequate representative of the New Mexico class.

24 The undersigned parties jointly and respectfully request that the Court enter this stipulation  
25 as an order.

1 PURSUANT TO STIPULATION, IT IS SO ORDERED.  
2

3 Dated: April 26, 2021

4   
5 Hon. Jon S. Tigar

6  
7 Dated: April 23, 2021

8 /s/ Mario N. Alioto

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21 *Lead Counsel for the  
22 Indirect Purchaser Plaintiffs*

23 Dated: April 23, 2021

24 /s/ John Taladay

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29 *Attorneys for Defendants Irico Group Corp.  
30 and Irico Display Devices Co., Ltd.*